

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JACQUELINE SILVER

15CV- 3462
NOTICE OF MOTION

--Plaintiff--

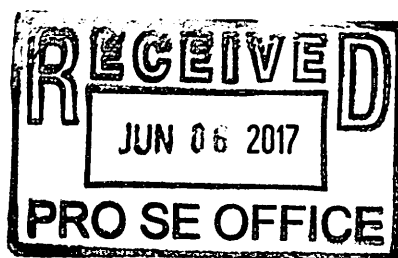
--against--

**SERGEANT SCOTT DALESSANDRO,
POLICE OFFICER LUIGI GALANO,
POLICE OFFICER NICHOLAS KOSTAS, AND
POLICE OFFICER EDWARD STINE.**

--Defendants--

PLEASE TAKE NOTICE, that upon the annexed affidavit of Jacqueline Silver sworn to June 1, 2017, and upon the **motion to quash**, herein, prose plaintiff will move this court, Judge Allyne R. Ross, United States District Court, United States Courthouse, Brooklyn, New York 11201., on the 21st day of June, 2017, as soon thereafter as Jacqueline Silver, prose plaintiff can be heard, for an order stopping Verizon Wireless in complying with the subpoena to produce plaintiffs phone records from May 27th 2012 to May 27, 2015, that was served on them, May 9th, 2017.

Dated: Queens, New York
June 1st, 2017



Jacqueline Silver
Plaintiff Pro Se
PO Box 604726
Bayside, NY 11360

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JACQUELINE SILVER

15CV- 3462
Affirmation

--Plaintiff--

--against--

**SERGEANT SCOTT DALESSANDRO,
POLICE OFFICER LUIGI GALANO,
POLICE OFFICER NICHOLAS KOSTAS, AND
POLICE OFFICER EDWARD STINE.**

--Defendants--

STATE OF NEW YORK) ss:
COUNTY OF KINGS)

I, JACQUELINE SILVER, being duly sworn, deposes and says, I am the pro se plaintiff in the above entitled action and respectfully move this court to issue an order stopping Verizon Wireless from complying with the subpoena to produce my Verizon Wireless Records from May 27, 2012- May 27, 2015. that the Corporation Counsel, Kaitlin Fitzgibbons, served on them back on May 9th.

The reason that I am entitled to this relief is because these Verizon Wireless records are irrelevant and premature to the plaintiff proving diligence on whether she made efforts to get the names of the cops before May 27, 2015. Plaintiff also wants to bring to the courts attention that Ms. Fitzgibbons didn't even ask me first

for those phone records instead went behind my back and subpoenaed them. Also once again, nothing was ever discussed in the conference or anytime thereafter about the subpoena, it came out of nowhere. Plaintiff Silver isn't clear on why the Corporation Counsel needs to have these records as I have the burden of proving diligence. At this point in time, plaintiff feels that the Verizon Wireless records are premature and counterproductive to the efforts I will be making for the limited discovery. As I stated in the last letter I sent to the court, I subpoenaed my own records that I will be using for the limited discovery. Plaintiff will be turning them over to Ms. Fitzgibbons.

WHEREFORE, plaintiff Silver respectfully requests that the court grant the within motion to quash , as well as such other relief that the court feels just and proper.

Sworn to before me this day of June

2, 2017

Notary Public



INGRID M. TAVERAS
Notary Public, State of New York
Qualified in Queens County
No. 01TA8320488
My Commission Expires March 09, 2019



Jacqueline Silver
Plaintiff Pro Se

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NEW YORK NY 100

03 JUN 2017 PM 13 L

Attn: Pro Se
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Court
Eastern District of NY
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